

5. ADT has incurred \$2,083,790.30 in attorney's fees and costs to defend the class action. The breakdown of that sum by law firm/vendor is as follows:

a.	Pepper Hamilton, LLP	\$1,790,473.12
b.	McGuire Woods	\$ 8,520.00
c.	Beveridge & Diamond, P.C.	\$ 105,172.16
d.	Special Counsel	\$ 152,296.08
e.	DiscoverE-Novitas	\$ 23,686.99
f.	IKON Office Solution	\$ 3,641.95

6. As of July 14, 2014, ADT has incurred \$189,514.41 in attorney's fees and costs to date to prosecute this third-party indemnity action. ADT will continue to incur fees and costs in the prosecution of this action as it continues in this Court. The breakdown of that sum by law firm/vendor is as follows:

a.	McNew, P.A.	\$ 165,796.55
b.	Polsinelli Shughart P.C.	\$ 4,382.50
c.	DiscoverE-Novitas	\$ 18,391.14
d.	Veritext	\$ 944.22

7. ADT has received contribution or indemnification from certain third parties or their affiliates in an aggregate amount of \$7 million. ADT has produced to Elephant Group's counsel copies of the confidential settlement agreements between ADT and the third-parties with whom it settled.

8. ADT has sought indemnification or contribution from each of the remaining third party defendants. Aside from Elephant Group, all other indemnitors cannot be located, have dissolved, or are judgment proof.

DATED: 7/14/14

FUTHER AFFIANT SAYETH NOT.



HANNAH LIM

The foregoing instrument was subscribed and sworn to before me this 14 day of July 2014, by HANNAH LIM who is personally known to me or who produced _____ as identification.



PATRICIA CAMPBELL
MY COMMISSION # FF 089710
EXPIRES: April 4, 2018
Bonded Thru Budget Notary Services



NOTARY PUBLIC, State of Florida
My commission expires: